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November 15, 2006

Colorado River and Salton Sea Office
Department of Water Resources
1416 9th Street, Room 1148-6
Sacramento, California

Dear Sirs,

Landscape and memory combine to tell us certain places are special, sanctified by their extraordinary natural merits. The Salton Sea is such a place.

It is a rare and irreplaceable ecosystem--the biggest lake; the last great southern wetland; the heart of the Pacific Flyway; visually stunning; brimming with vast economic and recreational potential.

We have an ecological catastrophe on our hands. If the Sea dies, an entire region dies too, for all time.

We inherited it. We are its custodians in the present. What we do now matters immensely to future generations.

We must act quickly. If we do, the Sea may well be recognized by our descendents as the greatest environmental success of the 21st Century. If we don't, an irreplaceable jewel will be lost forever.

Now, to the issues: first, the State of California has accepted responsibility for all but one hundred thirty three million dollars of the environmental consequence of the water transfer. Like any legally responsible party, its obligation to the Sea's preservation and restoration are guided by the National Environmental Policy Act and the California Environmental Policy Act:

> Under NEPA: "1) fulfill the responsibilities of each generation as trustee of the environment for succeeding generations..."
>
> And CEQUA: "(a) The maintenance of a quality environment for the people of this state now and in the future is a matter of statewide concern... (d) The capacity of the environment is limited, and it is the intent of the Legislature that the government of the state take immediate steps to identify any critical thresholds for the health and safety of the people of the state and take all coordinated actions necessary to prevent such thresholds being reached."

Given the intent of NEPA and CEQUA, it is truly sad to note that all of the alternatives in the PEIR ignore discussion of visual elements in the landscape. By so doing, they disregard the amazing majesty and fabulous scenery of California's Colorado Desert.

We strongly believe that the PEIR disregards the guiding intent of NEPA and CEQUA by not making a serious effort to take these important scenic values into account. We believe that all future EIR documents must, by law, rectify this oversight, or face legal action.

Second, every alternative in the PEIR provides but half measures. Each cuts the Salton Sea up, reduces its size greatly, and dries large portions of it out. In effect, each creates an Owens Valley air pollution debacle on a much larger scale—and the Owens Valley is currently the largest stationary source of pollution in America. This immediately makes any of the Alternatives subject to judicial intervention, if selected.

A new alternative which looks to maintain the sea's size and shape needs to be included—a **blended alternative**. The blended alternative includes: a) short term triage to save the lake now, and, 2) thoughtful alternatives over the longer term to insure its survivability for the next several hundred years.

The blended alternative includes the following:

SHORT TERM:

1. Infuse the situation with a sense of urgency. Shorten implementation timelines wherever possible. Treat the situation as a major ecological emergency—after all, it is. This is the last great American wetland on the Pacific Flyway. One of California's major ecosystems is at risk. Use the Governor's power of emergency, if necessary.

The current implementation timeline in the PEIR is convenient for bureaucrats, but it is disastrous for the Salton Sea ecosystem.

2. Immediately "turn on the tap" fully at the Colorado River, to take advantage of as much fresh water for as long as possible during the 10 years we have left. Drain it into the Sea as fast as possible. We need to take it while we can get it, for it will postpone the death of the sea in the short term, until more permanent solutions can be implemented.

3. USE the IID/San Diego agreement to fallow the maximum land in the Imperial Valley, starting right away. Divert all of this water to the Sea while it's still available, to help in desalinization.

2. Capture as much extra water as is practicable during whatever flood years occur between now and 2017 and divert as much as possible of it to the Sea for the same reasons.

4) Start diking along the margins to create evaporation ponds to evaporate as much salt as is possible as soon as possible.

5). Build semi-permanent transit pipelines to Palen and/or Clark Lakes or Pinto Basin, or other suitable locations. Start pump-out as soon as possible, again to maximize salt removal from the Sea.

6) Amend State Law to require San Diego and Metropolitan Water Districts to incorporate mandatory water saving landscape vegetation around all homes and businesses served by the 200,000 acre feet taken from IID. Water wastage triggered the intervention by the Federal Government in the first place. Why not pass the restrictions on to urban areas receiving the new water?

LONG TERM:

We favor an augmented Alternative 7 for long term restoration of the Sea. We say this because we think the key to the Sea's long term revival and survival is a continuous source of new, life giving water.

Since fresh water cannot be spared, a pipeline/canal to bring salt water from the Pacific Ocean to the Sea must be built. The most likely route would be along the Interstate 8 corridor.

New inflows from the Pacific are the best way to keep the entire Sea's playa flooded, to protect air and water quality, to maintain stable water levels, and to nurture the overall ecosystem in a manner that most closely resembles the way it now exists. Such a choice satisfies the Federal Clean Air and Water Acts and will withstand judicial review in a manner that other alternatives presented in the PEIR will not.

This canal from the Pacific was inexplicably and prematurely dismissed in the current draft PEIR alternatives. It should be put back in to the document.

Alternative 7 includes two marine seas. Both use large dikes to seal off the brine sink. We strongly feel that the dikes, as currently envisioned and pictured in the PEIR, are ugly. We strongly suggest that any final design avoid inflicting straight dikes, so beloved by civil engineers, on this most beautiful of desert lakes.

We feel dikes on both the North and South Lakes should be camouflaged into naturalistic estuarine forms consistent with other portions of the Colorado River drainage. This could be done easily by means of stationary dredges. Bays and lakes have been terraformed in this manner for decades (Mission, Alamitos and Newport Bays, for example).

Since the Federal Government forced this water transfer on California, it should play a grater political and financial role in the Sea's restoration. We recommend that the State ask the Federal Government to begin political negotiations with Mexico for rights to a

drainage canal to the Gulf of California or Laguna Salada. The State should also begin lobbying to obtain major Federal Financing to pay for the new canal from the Pacific.

Lastly, we feel that the Pacific Ocean canal should be designed on a scale sufficient to provide much more water than the 200,000 acre feet that is now being taken. We know the thirst of San Diego will not be satisfied with this first drink. We need to be honest about what is coming in the future, and provide sufficient spare capacity while in the planning and building stages. It will be cheaper in the long run.

In conclusion, the Salton Sea is a priceless resource, essential to the Coachella Valley and Southern California. It deserves foresighted preservation of its desert and waters, lands and minerals, for the greatest good of the greatest number for the longest time. By initiating short term triage immediately and building a pipeline/canal from the Pacific Ocean to provide a source of water full of vital, life sustaining energy, Alternative 7 will provide a viable way of saving and restoring the Salton Sea.

Thank you for this chance to comment.

Sincerely,

Christopher W. Cockroft

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November 28, 2006

Colorado River and Salton Sea Office
Department of Water Resources
1416 9th Street, Room 1148-6
Sacramento, California

Dear Sirs,

Although we have already written one letter commenting on preferred alternatives in the PEIR, we missed a major issue we would like to address here.

We feel that the seismic assumptions used in the PEIR are significantly understated.

In the PEIR, dikes are designed to withstand a 7.8 earthquake with a six foot displacement. We think that earthquakes of this magnitude are far too common on the San Andreas and San Jacinto faults to be used as the design ceiling for the various alternatives.

From historic records we know Fort Tejon experienced an 8.2 earthquake in 1857; Lone Pine a 7.6 to 8.0 (with a 15-20' vertical and 35-40' horizontal displacement) in 1872; Imperial Valley had a 7.8 in 1892; Kern County had a 7.3 in 1952; and Landers a 7.2 in 1992. The scale and frequency of these "garden variety" great quakes suggests that PEIR planning needs to be scaled up to account for even larger quakes, especially since recent geological studies show this area of the San Andreas locked up and due for a huge temblor in the near future.

Additionally, not only are the sizes earthquakes badly underestimated, but dike foundations will sit on multiple layers of silt and sand. In the event of a significant quake they can be expected to experience dangerous liquefaction—another reason to up the design ceiling.

We would remind the Committee that such an increase is essential. Imagine the damage if a fully filled dike breaks in the sea--it would mean the end to the entire marine ecosystem, the destruction of the economic engine of the great lake, and the inundation of major bird habitats.

We feel the PEIR must acknowledge the inadequacy of 7.8 as the design standard and increase the anticipated scale to 8.5 for planning purposes. Concomitant to this, staff must rewrite the alternatives and studies it used to support design decisions so they accurately reflect this change.

The choice of magnitude of quakes is too important to understate. The choice of 8.5 on the Richter as the upper design ceiling provides more survivability for a much longer period of time.

We owe it to future generations to plan conservatively, using the larger figure.

Thank you for this chance to comment.

Sincerely,

Christopher W. Cockroft

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